

April 10, 1986

MEMORANDUM

Subject: General Dynamics

From: Rich Vaille  
Toxics Section Chief, T-5-2

To: Bill Wick  
ORC Toxics Team Leader

Background

On November 14 and 15, 1985 EPA Field Investigators Any Schmidt and Frances Schultz conducted a TSCA PCB Inspection at the U.S. Air Force Plant 19 operated by General Dynamics in San Diego, California.

Facts/Findings

During this investigation, the EPA Investigators observed that:

- 1) General Dynamics had not maintained adequate records of inspection for their PCB Transformers in use. In addition, General Dynamics had not conducted quarterly inspections for all of their PCB Transformers. 40 C.F.R. 761.30(a)(1)(iv) and (ii).  
Proposed penalty: \$13,000
- 2) General Dynamics had not developed or maintained a record keeping system or prepared an annual document for their PCBs or PCB equipment in use or in storage for disposal. 40 C.F.R. 761.180(a) and (b).  
Proposed penalty: \$11,000
- 3) An area in Building 1 of U.S. Air Force Plant 19 was used to store PCB Containers and was not marked with the PCB caution label (M<sub>L</sub>). 40 C.F.R. 761.40(a)(10).  
Proposed penalty: \$500
- 4) PCB Containers in storage for disposal had not been stored in a facility that complies with the required design features of a PCB storage facility and had not been inspected on a monthly basis for leaks. 40 C.F.R. 761.65(b)(iv) and (c)(5).  
Proposed penalty: \$500



5) Liquid PCBs had leaked from ~~twelve~~<sup>ELEVEN</sup> in-service PCB Transformers and ~~three~~<sup>TWO</sup> PCB Transformers formerly in service. 40 C.F.R. 761.60(a).

Proposed penalty: \$~~55~~<sup>50</sup>,000

Total proposed penalty: \$~~80~~<sup>80</sup>,000

Recommendations

The level of violations noted above at U.S. Air Force Plant 19 warrants that a Civil Complaint be issued to the operating contractor, General Dynamics Corporation.

*what is the current status?*

*not in service / unknown if*

*properly disposed of because no records available to document and track.*